

Attachment C

EVALUATION CRITERIA FOR SUBSTANCES ADDED TO OR REMOVED FROM THE NATIONAL LIST

Category 1. Adverse impacts on humans or the environment?Substance Hydrated Lime

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Are there adverse effects on environment from manufacture, use, or disposal? [§205.600 b.2]			X	Large amounts of energy required in production, and large amounts of dust produced during mining and manufacturing (TAP report)
2. Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]	X			Misuse could result in environmental contamination (MSD sheet).
3. Is the substance harmful to the environment? [§6517c(1)(A)(i);6517(c)(2)(A)i]	X			Substance could be harmful if not used and disposed of properly (MSD sheet).
4. Does the substance contain List 1, 2, or 3 inerts? [§6517 c (1)(B)(ii); 205.601(m)2]			X	
5. Is there potential for detrimental chemical interaction with other materials used? [§6518 m.1]			X	
6. Are there adverse biological and chemical interactions in agro-ecosystem? [§6518 m.5]	X			Substance ionizes readily in water, is soluble in water, and reacts violently with acids (TAP report)
7. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5]	X			Improper use can be detrimental (MSD sheet)
8. Is there a toxic or other adverse action of the material or its breakdown products? [§6518 m.2]	X			Substance is toxic (MSD sheet)
9. Is there undesirable persistence or concentration of the material or breakdown products in environment?[§6518 m.2]	X			By-product sources may contain heavy metals (TAP report)
10. Is there any harmful effect on human health? [§6517 c (1)(A)(i) ; 6517 c(2)(A)i; §6518 m.4]	X			Exposure to dust during various stages of mining and manufacturing (TAP report)
11. Is there an adverse effect on human health as defined by applicable Federal regulations? [205.600 b.3]			X	May burn eyes, skin mucous membranes, lungs, nose, and throat, along with vomiting, diarrhea, collapse and delayed esophageal damage if ingested (TAP report)
12. Is the substance GRAS when used according to FDA's good manufacturing practices? [§205.600 b.5]			X	
13. Does the substance contain residues of heavy metals or other contaminants in excess of FDA tolerances? [§205.600 b.5]				Possibly (TAP report)

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 2. Is the Substance Essential for Organic Production?

Substance Hydrated Lime

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance formulated or manufactured by a chemical process? [6502 (21)]	X			TAP
2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]	X			TAP
3. Is the substance created by naturally occurring biological processes? [6502 (21)]		X		TAP
4. Is there a natural source of the substance? [§205.600 b.1]			X	
5. Is there an organic substitute? [§205.600 b.1]			X	
6. Is the substance essential for handling of organically produced agricultural products? [§205.600 b.6]			X	
7. Is there a wholly natural substitute product? [§6517 c (1)(A)(ii)]	X			Ground limestone is available.
8. Is the substance used in handling, not synthetic, but not organically produced? [§6517 c (1)(B)(iii)]			X	
9. Is there any alternative substances? [§6518 m.6]	X			Ground limestone is available.
10. Is there another practice that would make the substance unnecessary? [§6518 m.6]	X			Ground limestone is available.

¹If the substance under review is for crops or livestock production, all of the questions from 205.600 (b) are N/A—not applicable.

Category 3. Is the substance compatible with organic production practices?

Substance Hydrated Lime

Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
1. Is the substance compatible with organic handling? [§205.600 b.2]	X			TAP
2. Is the substance consistent with organic farming and handling? [§6517 c (1)(A)(iii); 6517 c (2)(A)(ii)]	X			TAP
3. Is the substance compatible with a system of sustainable agriculture? [§6518 m.7]	X			TAP
4. Is the nutritional quality of the food maintained with the substance? [§205.600 b.3]			X	
5. Is the primary use as a preservative? [§205.600 b.4]			X	
6. Is the primary use to recreate or improve flavors, colors, textures, or nutritive values lost in processing (except when required by law, e.g., vitamin D in milk)? [205.600 b.4]			X	
7. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:				TAP
a. copper and sulfur compounds;		X		
b. toxins derived from bacteria;		X		TAP
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		X		TAP
d. livestock parasiticides and medicines?	X			TAP
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		X		TAP

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